

TEICH GROH

By: Brian W. Hofmeister, Esq.

691 State Highway 33

Trenton, New Jersey 08619

(609) 890-1500

(609) 890-6961 - facsimile

bhofmeister@teichgroh.com

Attorneys for Debtor

In the Matter of:) UNITED STATES BANKRUPTCY COURT
) FOR THE DISTRICT OF NEW JERSEY
FHG ENTERPRISES, INC.,)
) CASE NO. 11
)
Debtor.) CHAPTER 11
)
) NOTICE OF MOTION FOR AN ORDER
) AUTHORIZING USE OF CASH COLLATERAL
)
) RETURN DATE:
) Oral Argument: Required
)
)
)
)

TO: United States Trustee's Office
One Newark Center
Suite 2100
Newark, NJ 07102

20 LARGEST UNSECURED CREDITORS

PLEASE TAKE NOTICE that the undersigned, attorneys for Debtor, FHG Enterprises Inc. ("Debtor") herein, shall appear before the Honorable _____, Judge, United States Bankruptcy Court, 401 Market Street, Camden, New Jersey, on the ____ day of August, 2011 at 10:00 in the forenoon, or as soon thereafter as counsel may be heard and shall apply for an Order Authorizing Use of Cash Collateral.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this case. (If you do not have an attorney, you

may wish to consult one).

PLEASE TAKE FURTHER NOTICE that, if you do not want the Court to enter an Order Authorizing Use of Cash Collateral, or if you want the Court to consider your views on this Motion, then on or before August ____, 2011, you or your attorney must:

File, with the Court, a written objection to this Motion, explaining your position to the Clerk, United States Bankruptcy Court, 401 Market Street, Camden, New Jersey 08101;

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before August ____, 2011. You must also mail a copy to Brian W. Hofmeister, Esq., Teich Groh, 691 State Highway 33, Trenton, New Jersey 08619; and

You must attend the hearing scheduled to be held on August ____, 2011 at 10:00 a.m. 401 Market Street, Camden, New Jersey.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in this Motion and may enter an order granting the relief requested.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the annexed Verified Application. In addition, if objections are submitted, the undersigned will be appearing for oral argument at the hearing.

PLEASE TAKE FURTHER NOTICE that since the within Motion requests that the Court enter an Order Authorizing Use of Cash Collateral, and said Motion is based largely on the facts as outlined in the Verified Application in support of the within Motion, it is respectfully submitted that since this Motion does not present complicated questions of fact or unique questions of law, no brief

is necessary to assist the Court in its consideration of this Motion.

TEICH GROH
Attorneys for Debtor, FHG Enterprises, Inc.

BY: /s/Brian W. Hofmeister
Brian W. Hofmeister

Dated: August 2, 2011